

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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QUICK CUISINE AG,

Plaintiff,

v.

UB2B INC., CMA TRADING INC., and  
UNIVERSAL FOOD TRADING,

Defendants.

Case No.: 08-CV-1601  
(Lynch, J.) (Francis, M.J.)

**NOTICE OF MOTION TO VACATE  
DEFAULT JUDGMENT AS TO  
DEFENDANTS UB2B, INC. AND  
UNIVERSAL FOOD TRADING  
PURSUANT TO F.R.C.P. 60(b) AND TO  
DISMISS PLAINTIFF'S COMPLAINT  
FOR LACK OF PERSONAL  
JURISDICTION AS TO ALL  
DEFENDANTS PURSUANT TO F.R.C.P.  
12(b)(2)**

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**PLEASE TAKE NOTICE** that, Defendants, UB2B Inc., CMA Trading, Inc. and Universal Food Trading, (collectively "Defendants"), by and through their undersigned counsel of record, will move this Honorable Court before United States Judge Gerard H. Lynch at the United States Courthouse located at 500 Pearl Street, New York, New York, and at a time to be fixed by the Court, for an Order Vacating Default Judgment entered against UB2B, Inc. and Universal Food Trading Pursuant to F.R.C.P. 60(b), and to Dismiss Plaintiff's Complaint as to all Defendants for Lack of Personal Jurisdiction pursuant to FRCP 12(b)(2), and granting such other and further relief as the Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that, in support of this Motion, Defendants will rely on the accompanying Memorandum of Law in Support of Motion and Certifications of Fatima Siner, Ulises Sabato, Gus Eben and Michael J. Marotte, Esq.

**PLEASE TAKE FURTHER NOTICE** that, Defendants request oral argument upon the hearing of this Motion if it is opposed.

Dated: Morristown, New Jersey  
August 20, 2008

Respectfully submitted,  
SCHENCK, PRICE, SMITH & KING, LLP

/s/ John P. Campbell (JC-8746)  
John P. Campbell (JC-8746)  
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Attorneys for Defendants, UB2B Inc., CMA  
Trading Inc., and Universal Food Trading

***To (Via Federal Express Overnight Delivery and Regular Mail):***

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